

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION**

Civil Action No. 2:20-CV-03211-SDM-CMV

GROUNDWORKS OPERATIONS, LLC
f/k/a JES OPERATIONS, LLC,
d/b/a GROUNDWORKS
911 Stelzer Road
Columbus, Ohio 43219

GROUNDWORKS OBA, LLC n/k/a
GROUNDWORKS OHIO, LLC d/b/a
OHIO BASEMENT AUTHORITY
911 Stelzer Road
Columbus, Ohio 43219

Plaintiffs,

v.

LAWRENCE JANESKY
725 Breakneck Hill Road
Middlebury, CT 06762

and

CONTRACTOR NATION
CORPORATION,
c/o Lawrence M. Janesky, Agent
60 Silvermine Road
Seymour, CT 06483

and

MID-STATE BASEMENT SYSTEMS, LLC
c/o Wesley Martin, Agent
5476 Camlin Place
Westerville, OH 43081

Defendants.

**DECLARATION OF JORDAN
WILSON**

I, Jordan Wilson, declare as follows:

1. I am over 18 years of age, of sound mind, and I base this declaration on my personal knowledge.

2. I am a Certified Field Inspector (“CFI”) for Plaintiff Groundworks OBA, LLC n/k/a Groundworks Ohio, LLC d/b/a Ohio Basement Authority (“OBA”).

3. As a CFI, my job is to meet with prospective customers, assess the waterproofing and/or foundation problems, and provide an estimated cost of the project. Part of what I do is to discuss OBA’s ability to meet a customer’s need.

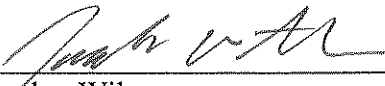
4. Recently, an OBA customer in Dublin, Ohio brought to my attention a flyer (the “Flyer”) that she had received from a representative of Mid-State Basement Systems, LLC who was soliciting her business. A true and accurate copy of the Flyer I obtained from this customer is attached hereto as Exhibit A. The Flyer was contained in a folder and accompanied by Mid-State’s Project Summary and proposal to provide basement waterproofing services for this customer. A true and accurate copy of the folder containing the Flyer is attached hereto as Exhibit B.

5. This customer had concerns and questions about the contents of the Flyer as it related to OBA’s services, goods, products, and business operations, which is why she brought the Flyer to my attention.

6. I had to reassure her that the statements in the Flyer were false and were made in an effort to cause her to doubt not only the quality of OBA’s services but whether OBA would be in business to meet her needs. Only after I discussed these matters with her was she persuaded that OBA would meet her needs.

I declare under penalty of perjury that the foregoing is true and correct.

This the 2nd day of July, 2020.



Jordan Wilson

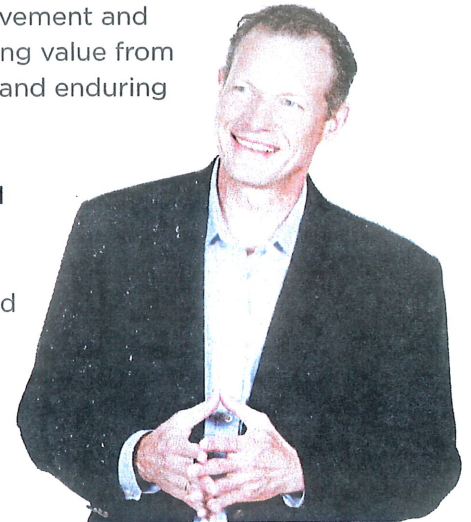
IT'S IMPORTANT TO KNOW YOUR CONTRACTOR.

It's important to understand the differences in the intentions of the contractor you are dealing with in our area as never before. Recently a private equity company bought a local contractor. The leader is self-proclaimed "From Wall Street" and said they are seeking to disrupt the foundation repair industry. They have stated their intentions to extract as much money as possible out of the businesses they buy. This of course, leads to all kinds of problems for employees and customers in the long term, and usually does not have a happy ending for anyone but the guys at the top who walk away with the money.

In contrast, our company is owned by Larry Janesky, who has been in the business for 33 years and has revolutionized it for the better. We are not interested in selling our business, but continuing to build it and holding it forever as we have done since 1987. Larry has built an incredible team, invented many huge improvements (32 patents), and spends his time training employees and contractors from coast to coast. In fact, he has trained over 5000 people, and his customer-focused programs, processes and products are used every day by 400 home improvement and repair companies across North America. He doesn't spend his time extracting value from his business through complex financial engineering, but in building people and enduring companies instead.

Go ahead, look Larry up! He writes a free daily blog every day for the last 11 years called "Think Daily" (subscribe free at ThinkDaily.com) that 27,000 people subscribe to. He has created the Contractor Nation School of Entrepreneurship, a 3-year course, to help contractors be better leaders and managers of their business and achieve excellence. He has dedicated his life to making the industry better – not rolling it up and flipping it.

We come from a very different place, and we will be here and stand the test of time.



| | Mid-State Basement Systems | Ohio Basement Authority |
|----------------------------------|---|---|
| Owned by | Passionate lifelong veteran of the business | Hedge fund |
| Innovation | 32 patents | No patents – copycats |
| Network Support | Part of Contractor Nation, 400 contractors strong | 11 offices – all purchased, none started from scratch by the majority owner |
| Change and Disruption | Steady | Company sold twice in 1 year |
| Management and Leadership | Trained at our own School of Entrepreneurship – a 3-year leadership course we developed | Focused on profits |
| Goal | Build and maintain an enduring business | Sell the company (again!) |

What kind of company do you want to do business with?

Larry Janesky's
**Mid-State
Basement Systems**
Since 1987

ALL
THINGS **BASEMENTY!**

Waterproofing

Foundation Repair

Crawl Space Repair

Humidity & Mold Control



844-840-1008

MidstateBasementSystems.com

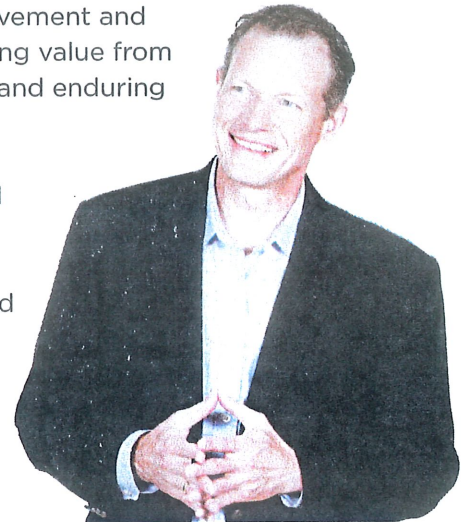
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